



LARGE BANK

Comptroller of the Currency
Administrator of National Banks

Washington, DC 20219

Public Disclosure

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Community Reinvestment Act
Performance Evaluation

First National Bank of Florida
Charter Number: 21830

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Naples, Florida 34102

Office of the Comptroller of the Currency

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NOTE: This document is an evaluation of this institution's record of meeting the credit needs of its entire community, including low- and moderate-income neighborhoods, consistent with safe and sound operation of the institution. This evaluation is not, and should not be construed as, an assessment of the financial condition of this institution. The rating assigned to this institution does not represent an analysis, conclusion, or opinion of the federal financial supervisory agency concerning the safety and soundness of this financial institution.

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Overall CRA Rating

Institution’s CRA Rating: This institution is rated **Satisfactory**.

The following table indicates the performance level of **First National Bank of Florida** with respect to the Lending, Investment, and Service Tests:

Performance Levels	First National Bank of Florida Performance Tests		
	Lending Test*	Investment Test	Service Test
Outstanding			
High Satisfactory	X	X	
Low Satisfactory			X
Needs to Improve			
Substantial Noncompliance			

* The lending test is weighted more heavily than the investment and service tests when arriving at an overall rating.

The major factors that support this rating include:

- Lending activity that reflects adequate responsiveness to credit needs of the bank’s assessment areas.
- A substantial majority of originated/purchased loans in the bank’s assessment areas.
- An adequate geographic distribution of loans in the bank’s assessment areas.
- A good distribution of loans by income level of the borrower.
- Community Development loans made in areas that received limited-scope reviews had a positive impact on the bank’s lending performance.
- A good level of qualified investments that are responsive to the credit and community development needs of the AAs. Investments made in areas that received limited-scope reviews strengthened the bank’s overall investment test performance.
- Retail delivery systems that are reasonably accessible to geographies and individuals of different income levels.
- A relatively high level of community development services.

Definitions and Common Abbreviations

The following terms and abbreviations are used throughout this performance evaluation, including the CRA tables. The definitions are intended to provide the reader with a general understanding of the terms, not a strict legal definition.

Affiliate: Any company that controls, is controlled by, or is under common control with another company. A company is under common control with another company if the same company directly or indirectly controls both companies. A bank subsidiary is controlled by the bank and is, therefore, an affiliate.

Aggregate Lending: The number of loans originated and purchased by all reporting lenders in specified income categories as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Block Numbering Area (BNA): A statistical subdivision of a county for grouping and numbering blocks in non-metropolitan counties where local census statistical area committees have not established census tracts. A BNA does not cross county lines.

Census Tract (CT): A small subdivision of metropolitan and other densely populated counties. Census tract boundaries do not cross county lines; however, they may cross the boundaries of metropolitan areas. Census tracts usually have between 2,500 and 8,000 persons, and their physical size varies widely depending upon population density. Census tracts are designed to be homogeneous with respect to population characteristics, economic status, and living conditions to allow for statistical comparisons.

Community Development: Affordable housing (including multifamily rental housing) for low- or moderate-income individuals; community services targeted to low- or moderate-income individuals; activities that promote economic development by financing businesses or farms that meet the size eligibility standards of the Small Business Administration's Development Company or Small Business Investment Company programs (13 CFR 121.301) or have gross annual revenues of \$1 million or less; or, activities that revitalize or stabilize low- or moderate-income geographies.

Community Reinvestment Act (CRA): the statute that requires the OCC to evaluate a bank's record of meeting the credit needs of its local community, consistent with the safe and sound operation of the bank, and to take this record into account when evaluating certain corporate applications filed by the bank.

Consumer Loan(s): A loan(s) to one or more individuals for household, family, or other personal expenditures. A consumer loan does not include a home mortgage, small business, or small farm loan. This definition includes the following categories: motor vehicle loans, credit card loans, home equity loans, other secured consumer loans, and other unsecured consumer loans.

Family: Includes a householder and one or more other persons living in the same household who are related to the householder by birth, marriage, or adoption. The number of family households always equals the number of families; however, a family household may also

include non-relatives living with the family. Families are classified by type as either a married-couple family or other family, which is further classified into 'male householder' (a family with a male household and no wife present) or 'female householder' (a family with a female householder and no husband present).

Full Review: Performance under the Lending, Investment, and Service Tests is analyzed considering performance context, quantitative factors (e.g., geographic distribution, borrower distribution, and total number and dollar amount of investments), and qualitative factors (e.g., innovativeness, complexity, and responsiveness).

Geography: A census tract or a block numbering area delineated by the United States Bureau of the Census in the most recent decennial census.

Home Mortgage Disclosure Act (HMDA): The statute that requires certain mortgage lenders that do business or have banking offices in a metropolitan area to file annual summary reports of their mortgage lending activity. The reports include such data as the race, gender, and the income of applications, the amount of loan requested, and the disposition of the application (e.g., approved, denied, and withdrawn).

Home Mortgage Loans: such loans include home purchase and home improvement loans, as defined in the HMDA regulation. This definition also includes loans for multifamily (five or more families) dwellings, loans for the purchase of manufactured homes and refinancing of home improvement and home purchase loans.

Household: Includes all persons occupying a housing unit. Persons not living in households are classified as living in group quarters. In 100 percent tabulations, the count of households always equals the count of occupied housing units.

Limited Review: Performance under the Lending, Investment, and Service Tests is analyzed using only quantitative factors (e.g., geographic distribution, borrower distribution, total number and dollar amount of investments, and branch distribution).

Low-Income: Individual income that is less than 50 percent of the area median income, or a median family income that is less than 50 percent, in the case of a geography.

Market Share: The number of loans originated and purchased by the institution as a percentage of the aggregate number of loans originated and purchased by all reporting lenders in the MA/assessment area.

Median Family Income (MFI): The median income determined by the U.S. Census Bureau every ten years and used to determine the income level category of geographies. Also, the median income determined by the Department of Housing and Urban Development annually that is used to determine the income level category of individuals. For any given area, the median is the point at which half of the families have income above it and half below it.

Metropolitan Area (MA): Any primary metropolitan area (PMA), metropolitan area (MA), or consolidated metropolitan area (CMA), as defined by the Office of Management and Budget, with a population of 250,000 or more, and any other area designated as such by the appropriate federal financial supervisory agency.

Middle-Income: Individual income that is at least 80 percent and less than 120 percent of the area median income, or a median family income that is at least 80 percent and less than 120 percent, in the case of a geography

Moderate-Income: Individual income that is at least 50 percent and less than 80 percent of the area median income, or a median family income that is at least 50 percent and less than 80 percent, in the case of a geography.

Multifamily: Refers to a residential structure that contains five or more units.

Other Products: Includes any unreported optional category of loans for which the institution collects and maintains data for consideration during a CRA examination. Examples of such activity include consumer loans and other loan data an institution may provide concerning its lending performance.

Owner-Occupied Units: Includes units occupied by the owner or co-owner, even if the unit has not been fully paid for or is mortgaged.

Qualified Investment: A qualified investment is defined as any lawful investment, deposit, membership share, or grant that has as its primary purpose community development.

Rated Area: A rated area is a state or multi-state metropolitan area. For an institution with domestic branches in only one state, the institution's CRA rating would be the state rating. If an institution maintains domestic branches in more than one state, the institution will receive a rating for each state in which those branches are located. If an institution maintains domestic branches in two or more states within a multi-state metropolitan area, the institution will receive a rating for the multi-state metropolitan area.

Small Loan(s) to Business(es): A loan included in 'loans to small businesses' as defined in the Consolidated Report of Condition and Income (Call Report) and the Thrift Financial Reporting (TFR) instructions. These loans have original amounts of \$1 million or less and typically are either secured by nonfarm or nonresidential real estate or are classified as commercial and industrial loans. However, thrift institutions may also exercise the option to report loans secured by nonfarm residential real estate as "small business loans" if the loans are reported on the TFR as nonmortgage, commercial loans.

Small Loan(s) to Farm(s): A loan included in 'loans to small farms' as defined in the instructions for preparation of the Consolidated Report of Condition and Income (Call Report). These loans have original amounts of \$500,000 or less and are either secured by farmland, or are classified as loans to finance agricultural production and other loans to farmers.

Tier One Capital: The total of common shareholders' equity, perpetual preferred shareholders' equity with non-cumulative dividends, retained earnings and minority interests in the equity accounts of consolidated subsidiaries.

Upper-Income: Individual income that is more than 120 percent of the area median income, or a median family income that is more than 120 percent, in the case of a geography.

Description of Institution

First National Bank of Florida (FNBF) is a full-service financial institution headquartered in Naples, Florida. FNBF offers a full range of credit products throughout their Florida market including real estate, commercial, and consumer loans. The bank has no subsidiaries.

For purposes of the CRA evaluation, FNBF is an intrastate bank with 43 offices operating in Florida only. As a result of a corporate charter consolidation plan that was completed in the first quarter of 2001, the previous standalone six Florida banks were consolidated under First National Bank of Florida. Consequently, HMDA and small business loans were considered for the surviving Naples bank only for 1999, 2000, and 2001. The HMDA and small business loans for the five affiliated banks that were merged were evaluated or considered for 2001 only, as information for 1999 and 2000 were filed separately under each bank's charter. See Appendix A for time periods reviewed for the Lending, Investment and Service Tests.

As of August 5, 2002, FNBF's markets included five Metropolitan Statistical Areas (MSA). The bank's Florida banking headquarters and ten branches are located in the Naples MSA (Collier County). Other additional banking regions are located throughout Southwestern and Central Florida and include Tampa-St. Petersburg MSA (Pinellas County - 11 branches), Fort Myers MSA (Lee County - 8 branches), Sarasota-Bradenton MSA (Sarasota County - 7 branches), and Orlando MSA (Orange and Seminole Counties – 6 branches). Since July 2002, these regional areas consolidated their individual brand names under the First National Bank brand offering the same products and services. The bank has 32 automated teller machines (ATMs) distributed throughout the assessment areas. FNBF's most recent acquisitions were in the Sarasota-Bradenton MSA and Orlando MSA. The seven offices in the Sarasota-Bradenton MSA were the result of a purchase and consolidation of two community banks in 1999. The six offices in the Orlando MSA were the result of an acquisition in February 2002 and they are not part of our CRA evaluation.

As of March 31, 2002, FNBF reported total assets of \$2.5 billion. Traditionally, the bank has emphasized real estate lending. Total loans of \$1.8 billion represented 72% of total assets and consisted of 80% real estate, 11% commercial and industrial, 5% personal installment, and 4% lease financing. The 80% of real estate loans breaks down as follows: 35% non-farm residential, 31% 1-4 family residential, 11% construction and development, 3% home equity. The loan-to-deposit ratio was 91%. Tier 1 capital of \$170.6 million represented 6.7% of total assets. Tier 1 capital to risk-weighted assets was 8.99%.

FNBF is 100% owned by F.N.B. Corporation (FNBC) whose corporate headquarters was moved from Hermitage, Pennsylvania to Naples, Florida effective June 1, 2001. FNBC is a diversified financial services company that owns and operates traditional commercial banks, insurance agencies, a consumer finance company and First National Trust Company. FNBC is the largest bank holding company headquartered in the State of Florida.

There are no legal, financial or other factors impeding the bank's ability to help meet the credit needs of its assessment areas. FNBF's CRA performance was rated "Satisfactory" in the last public evaluation dated February 8, 1999.

Scope of the Evaluation

Evaluation Period/Products Evaluated

This Performance Evaluation assesses the bank's performance under the Lending, Investment and Service Tests. In evaluating the bank's lending performance, we reviewed their residential mortgage loans subject to filing under HMDA and small loans to businesses. Small loans to farms were not evaluated. FNBF originated or purchased only one small farm loan during the evaluation period.

With the exception of community development (CD) loans, the evaluation period for the Lending Test is January 1, 1999 through December 31, 2001. For CD loans, the Investment Test and the Services Test, the evaluation period is January 1, 1999 through August 5, 2002.

Data Integrity

This evaluation is based on accurate data. As part of this CRA evaluation, we relied upon management's internal review. No sampling of HMDA or CRA data was required at FNBF (the surviving bank) due to reliability of data from our sampling performed at the 1999 data integrity exam and the bank's adequate data gathering systems. No testing of HMDA or CRA data was required for the non-surviving banks because the analysis only considered information since the merger that occurred during 2001.

CD loans, investments and services submitted by FNBF management were verified to ensure that they met the regulatory definition for community development. Some items submitted by FNBF for consideration were excluded from this evaluation because they did not meet the definition or purpose of community development.

Selection of Areas for Full-Scope Review

Of the five AAs FNBF serves, we selected the Naples MSA for a full scope review. This AA represents the bank's major market accounting for 56 percent of all loan originations and 35 percent of FNBF's deposits. Limited-scope reviews were performed in the bank's two other primary markets, the Fort Myers MSA and Tampa-St Petersburg MSA. These two areas were considered due to the additional activity in the bank's community development and multi-family lending ~~activity~~. Refer to Appendix A for more information regarding the AAs receiving full-scope and limited-scope reviews.

Ratings

The bank's overall rating is based primarily on those areas that received full-scope reviews. FNBF's overall rating under each test is the consolidation of conclusions reached for the Naples MSA. Small loans to businesses were weighted more heavily than home mortgage products. Within home mortgage lending, home purchases, and refinanced loans received equal weight. Home improvement loans received the least weight. This weighting is reflective of FNBF's loan volume by product type over the evaluation period.

Other

To assist us in identifying credit and community development needs we met with a local economic development council that fosters the economic diversification of the local economy and promotes economic development initiatives. Through an extensive network of resources, the Economic Development Council assists qualified businesses with expansion or relocation projects throughout the county. This contact was performed because of the commercial lending emphasis of FNBF. We also reviewed other information regarding lending opportunities, constraints and credit needs in the bank's AA. Commonly identified needs were credit to very small businesses and entrepreneurs, homeownership counseling and small business owner technical training. Other community development needs include loans to build, rehabilitate, and purchase affordable housing.

Fair Lending Review

An analysis of the most recent public comments, consumer complaint information and HMDA and CRA small business lending was performed according to the OCC's risk based fair lending approach. Based on its analysis of the information, the OCC decided that a comprehensive fair lending examination would not need to be conducted in connection with the CRA evaluation this year. The latest comprehensive fair lending exam was performed in February 1999.

Conclusions with Respect to Performance Tests

LENDING TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the lending test is rated "High Satisfactory". Based on a full-scope review, the bank's performance in the Naples MSA is good. The bank's level of community development lending in the limited-scope AAs had a positive impact on the lending test.

Lending Activity

Refer to Tables 1 Lending Volume and 1 in Appendix C for the facts and data used to evaluate the bank's lending activity.

The bank's lending activity reflects adequate responsiveness to the credit needs of its AA. In 2000, the bank's 7.42% market share of small business loans placed it fourth among lenders in the Naples MSA. In the Naples MSA, there are 115 lenders making small loans to businesses. By comparison, FNBF's 14.05% market share of deposits ranks it third among financial institutions. There are 30 commercial banks with banking offices throughout the AA.

Based on 2000 aggregate HMDA data, FNBF ranked eighth in overall volume of HMDA lending with a market share of 2.63%. In the Naples MSA, there are 460 HMDA lenders. In terms of HMDA products, FNBF ranked from number 6 for home improvement loans to number 12 for home purchase loans. Their market share ranged from 1.84% for refinanced loans to 6.04% for home improvement loans. The bank had no community development lending in the Naples MSA.

Distribution of Loans by Income Level of the Geography

Overall, the geographic distribution of loans throughout the full-scope assessment area is adequate. The geographic distribution of HMDA loans is adequate. The geographic distribution of small loans to businesses is adequate.

Factors that influence the amount of HMDA loans to low-income geographies include the number and location of low-income geographies and median housing values. Of the two low-income geographies in the Naples MSA, only one was within close proximity to FNBF's branches and deposit-taking ATMs. The one low-income geography had less than 100 owner occupied homes (.23% of the total owner occupied units in the MSA). The median housing value for the Naples MSA is \$161 thousand making it difficult for low-income families to afford homes. Because of the low level of homeownership, this also has an adverse impact on refinancing and home improvement lending in the low-income geographies.

There are no moderate-income geographies located within close proximity to the bank's branches and deposit-taking ATMs. Furthermore, only 7.73% of owner-occupied units are

located in these moderate-income tracts (approximately 3 thousand units). We reviewed the geographic distribution and market share analysis of these loans, but determined that due to the low volume of home mortgage and small business loans this category would have limited weight in evaluating the bank's lending performance.

Home Mortgage Loans

Refer to Tables 2, 3, 4 and 5 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's home mortgage loan originations and purchases.

Home purchase lending geographic distribution is adequate. The percentage of home purchase loans in moderate-income geographies is lower than demographics. FNBF made a small number of home purchase loans in low-income geographies.

Home improvement lending geographic distribution is adequate. The percentage of home improvement loans in moderate-income geographies is lower than demographics, but is not very meaningful due to the small number of loans. FNBF made no home improvement loans in low-income geographies.

Refinanced home lending geographic distribution is adequate. The percentage of refinanced loans in moderate-income geographies is lower than demographics, but is not meaningful due to the small number of loans. FNBF made no refinanced loans in low-income geographies.

The bank originated two multifamily loans in the Naples MSA. Consequently, a geographical analysis of multifamily loans is not meaningful.

Small Loans to Businesses

Refer to Table 6 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to businesses.

The small loan to businesses geographic distribution in the Naples MSA is adequate. The percentage of FNBF's loans in both low- and moderate-income geographies is somewhat lower than the percentage of businesses located in these geographies. FNBF's market share in low-income tracts exceeds its overall market share. In moderate-income geographies, FNBF's market share is near to its overall share of the MSA's market.

Small Loans to Farms

Refer to Table 7 in Appendix C for the facts and data used to evaluate the geographic distribution of the bank's origination/purchase of small loans to farms.

The bank made no small loans to farms in the full-scope assessment area during this evaluation period.

Lending Gap Analysis

No unexplained conspicuous gaps were identified. We evaluated the lending distribution in the full-scope assessment area to determine if any unexplained conspicuous gaps existed. We

reviewed lending reports detailing the volume of HMDA and small loans to businesses in low- and moderate-income geographies. This performance had a positive effect on the bank's overall geographic distribution analysis.

Inside/Outside Ratio

A substantial majority of the bank's loans is located within its assessment areas. The inside/outside ratio analysis was performed on the entire bank rather than individual or combined assessment areas. Over 98% of both home mortgage and small business lending took place inside the bank's assessment area. By number, 98% of home mortgage loans, 98% of the small loans to businesses, and 100% of CD Loans are within FNBF's assessment areas. This performance was positively factored into the overall geographic distribution analysis.

Distribution of Loans by Income Level of the Borrower

The overall distribution of loans by the income level of the borrower throughout the full-scope assessment area is good. The distribution of HMDA loans is excellent. The distribution of small loans to businesses is good.

Home Mortgage Loans

Refer to Tables 8, 9, and 10 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's home mortgage loan originations and purchases.

The distribution of HMDA loans by borrower income level throughout the full-scope assessment area is excellent. In evaluating the borrower distribution of home mortgage loans, we considered the number of families that live below the poverty level and the barriers that this may have on home ownership. Approximately 8% of the households in the full-scope assessment area live below the poverty level. According to 1990 Census data, 36% of the low-income families live below the poverty level, which makes it difficult for them to afford and maintain a home.

The distribution of home purchase loans is excellent. The bank's percent of home purchase loans to low-income borrowers is somewhat lower than the percent of low-income families that live in the AA. The bank's percent of home purchase loans to moderate-income borrowers exceeds the percent of moderate-income families that live in the AA. The bank's market share to low-income borrowers exceeds their overall market share. The bank's market share to moderate-income borrowers exceeds their overall market share.

The distribution of home improvement loans is excellent. The bank's percent of home improvement loans to low-income borrowers is near the percent of low-income families that live in the AA. The bank's percent of home improvement loans to moderate-income borrowers exceeds the percent of moderate-income families that live in the AA. The bank's market share to low-income borrowers exceeds their overall market share. The bank's market share to moderate-income borrowers exceeds their overall market share.

The distribution of refinance loans is good. The bank's percent of refinance loans to low-income borrowers is somewhat lower than the percent of low-income families that live in the

AA. The bank's percent of refinance loans to moderate-income borrowers exceeds the percent of moderate-income families that live in the AA. The bank's market share to low-income borrowers is near their overall market share. The bank's market share to moderate-income borrowers exceeds their overall market share.

Small Loans to Businesses

Refer to Table 11 in Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The distribution of small loans to businesses throughout the full-scope assessment area is good. The bank's percent of small loans to small businesses (businesses with annual revenues \$1 million or less) is near the percent of small businesses in the AA. Their market share of small loans to small businesses exceeds their overall market share of small loans to all businesses. A substantial majority of the bank's loans to small businesses is for amounts of \$100 thousand or less.

Small Loans to Farms

Refer to Table 12 in the Appendix C for the facts and data used to evaluate the borrower distribution of the bank's origination/purchase of small loans to businesses.

The bank made no small loans to farms in the full-scope assessment area during this evaluation period.

Community Development Lending

Refer to Table 1 Lending Volume in Appendix C for the facts and data used to evaluate the bank's level of community development lending. This table includes all CD loans, including multifamily loans that also qualify as CD loans. In addition, Table 5 includes geographic lending data on all multi-family loans, including those that also qualify as CD loans. Table 5 does not separately list CD loans, however.

The bank made no CD loans in the full-scope assessment area during this evaluation period and will have only a neutral impact in evaluating the bank's performance under the Lending Test.

Product Innovation and Flexibility

FNBF has one product that is considered flexible. The affordable housing product is called "Own-A-Home" and is targeted to low- and moderate-income individuals. This mortgage loan program is available to very low-, low-, and moderate-income persons with incomes of 100% of the MSA's median income or up to 120% of the MSA's median income in low- or moderate-income geographies. Flexible features of the program include a loan-to-value ratio of up to 97%, no private mortgage insurance, and various closing costs options including gifts, seller concessions, city/county program assistance or borrowed unsecured loans. The program provides a fixed rate for 30 years, with no origination or discount points and no internal bank fees. The bank also seeks to obtain below-market fees for the homebuyer from third-party settlement service providers. This program was offered only through branches located in the

full-scope assessment area. During the evaluation period, the bank originated 108 loans totaling \$10,719,135.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on the limited-scope reviews, the bank's performance under the lending test in the Fort Myers and Tampa-St. Petersburg MSAs are not inconsistent with the bank's overall "High Satisfactory" Lending Test rating. Refer to Tables 1 through 12 in Appendix C for the facts and data that support these conclusions.

INVESTMENT TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the investment test is rated "High Satisfactory". Based on full-scope reviews, the bank's performance in the Naples MSA is adequate. The bank's performance in the Fort Meyers and Tampa-St Petersburg MSAs strengthened the overall performance and had a positive impact on the Investment Test rating.

Refer to Table 14 in Appendix C for the facts and data used to evaluate the bank's level of qualified investments.

During this evaluation period, FNBF made \$629 thousand in qualified investments to qualified CD organizations. FNBF's investments represent 8/10ths of 1% of the allocated Tier I capital accorded the MSA. Given the limited CD opportunities and dollar amount of investments in the full-scope assessment area, FNBF's performance is adequate. Refer to the Market Profile section (Appendix B) for additional information on the available CD opportunities in the full-scope assessment area. These investments are not considered innovative or complex in nature but are responsive to identified needs in the community.

Of the \$629 thousand in qualified investments, \$594 thousand is attributed to four mortgage backed securities whose underlying mortgages were to low- and moderate-income individuals. The entire dollar amount of the bonds is secured by mortgages located within the full-scope assessment area.

The remaining \$35 thousand consists of qualified grants and donations to ten CD organizations. These organizations are involved in providing affordable housing for low- or moderate-income individuals and providing community services for low- and moderate-income individuals. The bank does not have prior period investments outstanding.

Conclusions for Area Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the service test in the Fort Meyers and Tampa-St. Petersburg MSAs are not inconsistent with the bank's overall "High Satisfactory" Investment Test rating. Refer to Table 14 in Appendix C for the facts and data that support these conclusions.

SERVICE TEST

Conclusions for Areas Receiving Full-Scope Reviews

The bank's performance under the Service Test is rated "Low Satisfactory". Based on the full-scope review, the bank's performance in the Naples MSA is adequate.

Retail Banking Services

Refer to Table 15 in Appendix C for the facts and data used to evaluate the distribution of the bank's branch delivery system and branch openings and closings.

The bank's retail delivery systems are reasonably accessible to geographies and individuals of different income levels in the full-scope assessment area. The bank operates eleven full-service banking offices in the Naples MSA. FNBF has no branches located in low- or moderate-income geographies within the full-scope assessment area. However, a branch located in upper-income geography is within walking distance to the only contiguous low-income geography.

The bank's record of opening and closing branches has not adversely affected the accessibility of its delivery systems. During the evaluation period, the bank opened two branches in the full-scope assessment area and closed one branch. The two branches that were opened were in upper-income tracts. The closed branch was also in an upper-income tract.

FNBF offers a range of banking products and services. The bank's services and business hours do not vary in a way that inconveniences the Naples MSA, particularly low- and moderate-income geographies and low- and moderate-income individuals.

Community Development Services

The bank provides a relatively high level of community development services in the Naples MSA. Four officers of FNBF from the Naples MSA participate in community development services. These activities facilitate affordable housing, the rehabilitation or development of affordable housing, and small business development. The noted officers and FNBF staff focus on such identified needs as providing technical expertise, credit counseling and pre-qualification interviews, evaluating credit and financial analysis for applicants of home loans, promoting awareness regarding programs for start-up small businesses, and fundraising.

Conclusions for Areas Receiving Limited-Scope Reviews

Based on limited-scope reviews, the bank's performance under the Service Test in the Fort Myers MSA and Tampa Bay-St Petersburg MSA is not inconsistent with the bank's overall "Low Satisfactory" performance under the Service Test. Refer to table 15 in Appendix C for the facts and data that support these conclusions.

Appendix A: Scope of Examination

The following table identifies the time period covered in this evaluation, affiliate activities that were reviewed, and loan products considered. The table also reflects the metropolitan and non-metropolitan areas that received comprehensive examination review (designated by the term “full-scope”) and those that received a less comprehensive review (designated by the term “limited-scope”).

Time Period Reviewed	Lending Test (excludes CD Loans): 01/01/99 to 12/31/01 Investment and Service Tests and CD Loans: 01/01/99 to 08/05/02	
Financial Institution	Products Reviewed	
First National Bank of Florida Naples, Florida	HMDA, small business, and CD loans	
Affiliate(s)	Affiliate Relationship	Products Reviewed
N/A		
List of Assessment Areas and Type of Examination		
Assessment Area	Type of Exam	Other Information
Naples MSA #5345	Full-Scope	
Fort Myers MSA #2700	Limited-Scope	
Tampa-St. Petersburg MSA #8280	Limited-Scope	

Appendix B: Market Profiles for Full-Scope Areas

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Market Profiles for Areas Receiving Full-Scope Reviews

Naples MSA	B - 2
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NAPLES MSA

Demographic Information for Full Scope Area: NAPLES MSA						
Demographic Characteristics	#	Low % of #	Moderate % of #	Middle % of #	Upper % of #	NA* % of #
Geographies (Census Tracts/BNAs)	31	6.45	12.90	41.94	38.71	0.00
Population by Geography	152,099	5.23	10.56	59.09	25.11	0.00
Owner-Occupied Housing by Geography	43,319	1.18	7.73	57.92	33.17	0.00
Business by Geography	13,163	1.51	4.32	59.41	34.76	0.00
Farms by Geography	579	1.38	16.93	62.00	19.69	0.00
Family Distribution by Income Level	44,136	17.77	19.99	22.95	39.29	0.00
Distribution of Low and Moderate Income Families throughout AA Geographies	16,666	8.45	16.01	60.16	15.38	0.00
Median Family Income HUD Adjusted Median Family Income for 2001 Households Below Poverty Level		38,428 65,000 8.05%	Median Housing Value Unemployment Rate (1990 US Census)		161,155 1.83%	

(*) The NA category consists of geographies that have not been assigned an income classification.
Source: 1990 US Census and 2001 HUD updated MFI

Naples, Florida is one of the more affluent resort and retirement areas in the State of Florida. Of the 20 metropolitan statistical areas (MSAs) in the state, the Naples MSA, which includes only Collier County, has the highest Housing and Urban Development (HUD) adjusted median family income during 2001. A large percent of Naples' population are retirees. Approximately 23% of the population is 65 years of age or older. The economy of the Naples MSA is seasonal and its population is a mix of wealthy retirees and low waged workers. In 1999, seventy percent (70%) of the Naples MSA population was employed in low paying jobs such as retail, services, and the hospitality industry. Tourism and construction are also vital industries. The areas largest employers include Naples Community Hospital, Publix Grocery Stores, and Marriott Resorts International.

During the evaluation, 56% of all loan originations were within the full-scope assessment area. Forty-nine percent (49%) of HMDA loan originations were within the full scope assessment area. Sixty-three percent (63%) of small business loan originations were within the full-scope assessment area. As of March 31, 2002, thirty-five percent (35%) of FNBF's deposits were in the full-scope assessment area. HMDA loan originations were within the full-scope assessment area.

Opportunities are scarce for community development lending, investment and services throughout the MSA. There are a few non-profit organizations whose missions focus on providing low- and moderate-income areas and people affordable housing and community services. There are also qualified non-profit organizations that accept contributions. FNBF works closely with these organizations. In addition, Collier County has an economic development council that works closely with the state-designated enterprise zones of Everglades City and Immokalee. The MSA has limited community development investments available in the form of governmental sponsored bonds and low-income housing tax credits.

FNBF has strong competition throughout its assessment area in all product lines. In addition to subsidiaries of large inter-state banks, there are community banks and thrift institutions. There are also mortgage brokers and investment firms which offer similar products and services.

Appendix C: Tables of Performance Data

Content of Standardized Tables

References to the “bank” include activities of any affiliates that the bank provided for consideration (refer to Appendix A: Scope of the Examination). For purposes of reviewing the lending test tables, the following are applicable: purchased loans are treated as originations/purchases and market share is the number of loans originated and purchased by the bank as a percentage of the aggregate number of reportable loans originated and purchased by all lenders in the MA/assessment area. Tables without data are not included in this PE.

The following is a listing and brief description of the tables:

- Table 1. Lending Volume** - Presents the number and dollar amount of reportable loans originated and purchased by the bank over the evaluation period by MA/assessment area. Community development loans to statewide or regional entities or made outside the bank’s assessment area may receive positive CRA consideration. Refer to Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such loans. When such loans exist, insert a line item with the appropriate caption, such as “Statewide/Regional” or “Out of Assessment Area,” in the MA/Assessment Area column and record the corresponding numbers and amounts in the “Community Development Loans” column.
- Table 1. Other Products** - Presents the number and dollar amount of any unreported category of loans originated and purchased by the bank over the evaluation period by MA/assessment area. Examples include consumer loans or other data that a bank may provide, at its option, concerning its lending performance. This is a two-page table that lists specific categories.
- Table 2. Geographic Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of owner-occupied housing units throughout those geographies. The table also presents market share information based on the most recent aggregate market data available.
- Table 3. Geographic Distribution of Home Improvement Loans** - See Table 2.
- Table 4. Geographic Distribution of Home Mortgage Refinance Loans** - See Table 2.
- Table 5. Geographic Distribution of Multifamily Loans** - Compares the percentage distribution of the number of multifamily loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of multifamily housing units throughout those geographies. The table

also presents market share information based on the most recent aggregate market data available.

- Table 6. Geographic Distribution of Small Loans to Businesses** - The percentage distribution of the number of small loans (less than or equal to \$1 million) to businesses originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of businesses (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small business data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 7. Geographic Distribution of Small Loans to Farms** - The percentage distribution of the number of small loans (less than or equal to \$500,000) to farms originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies compared to the percentage distribution of farms (regardless of revenue size) throughout those geographies. The table also presents market share information based on the most recent aggregate market data available. Because small farm data are not available for geographic areas smaller than counties, it may be necessary to use geographic areas larger than the bank's assessment area.
- Table 8. Borrower Distribution of Home Purchase Loans** - Compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage distribution of families by income level in each MA/assessment area. The table also presents market share information based on the most recent aggregate market data available.
- Table 9. Borrower Distribution of Home Improvement Loans** - See Table 8.
- Table 10. Borrower Distribution of Refinance Loans** - See Table 8.
- Table 11. Borrower Distribution of Small Loans to Businesses** - Compares the percentage distribution of the number of small loans (less than or equal to \$1 million) originated and purchased by the bank to businesses with revenues of \$1 million or less to the percentage distribution of businesses with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the business. Market share information is presented based on the most recent aggregate market data available.
- Table 12. Borrower Distribution of Small Loans to Farms** - Compares the percentage distribution of the number of small loans (less than or equal to \$500,000) originated and purchased by the bank to farms with revenues of \$1 million or less to the percentage distribution of farms with revenues of \$1 million or less. In addition, the table presents the percentage distribution of the number of loans originated and purchased by the bank by loan size, regardless of the revenue size of the farm.

Market share information is presented based on the most recent aggregate market data available.

Table 13. Geographic and Borrower Distribution of Consumer Loans (OPTIONAL) - For geographic distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank in low-, moderate-, middle-, and upper-income geographies to the percentage distribution of households within each geography. For borrower distribution, the table compares the percentage distribution of the number of loans originated and purchased by the bank to low-, moderate-, middle-, and upper-income borrowers to the percentage of households by income level in each MA/assessment area.

Table 14. Qualified Investments - Presents the number and dollar amount of qualified investments made by the bank in each MA/AA. The table separately presents investments made during prior evaluation periods that are still outstanding and investments made during the current evaluation period. Prior-period investments are reflected at their book value as of the end of the evaluation period. Current period investments are reflected at their original investment amount even if that amount is greater than the current book value of the investment. The table also presents the number and dollar amount of unfunded qualified investment commitments. In order to be included, an unfunded commitment must be legally binding, tracked, and recorded by the bank's financial reporting system.

A bank may receive positive consideration for qualified investments in statewide/regional entities or made outside of the bank's assessment area. See Interagency Q&As __.12(i) - 5 and - 6 for guidance on when a bank may receive positive CRA consideration for such investments. When such investments exist, insert a line item with the appropriate caption, such as "Statewide/Regional" or "Out of Assessment Area," in the MA/Assessment Area column and record the corresponding numbers and amounts in the "Qualified Investments" column.

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings - Compares the percentage distribution of the number of the bank's branches in low-, moderate-, middle-, and upper-income geographies to the percentage of the population within each geography in each MA/AA. The table also presents data on branch openings and closings in each MA/AA.

Table 1. Lending Volume

LENDING VOLUME												Geography: NAPLES MSA		Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001	
MA/Assessment Area (2001):	% of Rated Area Loans (#) in MA/AA	Home Mortgage		Small Loans to Businesses		Small Loans to Farms		Community Development Loans **		Total Reported Loans		% of Rated Area Deposits in MA/AA ***			
		#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)	#	\$ (000's)				
Full Review:															
NAPLES MSA	60.96	1,735	251,062	2,125	137,339	0	0	0	0	3,860	388,401	48.89			
Limited Review:															
FORT MYERS MSA	32.23	1,337	190,063	704	75,149	0	0	4	3,082	2,046	268,294	30.79			
TAMPA-ST.PETERSBURG	6.81	149	19,845	282	44,175	0	0	18	2,071	449	66,091	20.32			

* Loan Data as of December 31, 2001. Rated area refers to either the state or multi-state MA rating area.

** The evaluation period for Community Development Loans is From January 01, 1999 to August 05, 2002.

*** Deposit Data as of June 30, 2001. Rated Area refers to either the state, multi-state MA, or institution, as appropriate.

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Table2. Geographic Distribution of Home Purchase Loans

Geographic Distribution: HOME PURCHASE 2001		Geography: NAPLES MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
NAPLES MSA	953	48.38	1.18	0.10	7.73	1.36	57.92	65.06	33.17	33.47	2.08	1.92	0.41	2.51	1.57
Limited Review:															
FORT MYERS MSA	969	49.19	0.53	0.00	13.44	10.73	74.89	83.69	11.14	5.57	0.11	0.00	0.07	0.12	0.04
TAMPA- ST.PETERSBURG MSA	48	2.44	0.89	0.00	21.65	4.17	47.78	33.33	29.69	62.50	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Southeast Region 1.

** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by the number of owner occupied housing units in the area based on 1990 Census information.

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Table 3. Geographic Distribution of Home Improvement Loans

Geographic Distribution: HOME IMPROVEMENT 31, 2001		Geography: NAPLES MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER							
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
NAPLES MSA	150	73.53	1.18	0.00	7.73	4.67	57.92	78.67	33.17	16.67	11.45	0.00	5.56	13.78	6.80
Limited Review:															
FORT MYERS MSA	29	14.22	0.53	0.00	13.44	0.00	74.89	89.66	11.14	10.34	0.09	0.00	0.00	0.11	0.00
TAMPA-ST.PETERSBURG MSA	25	12.25	0.89	0.00	21.65	4.00	47.78	40.00	29.69	56.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Southeast Region 1.

** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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Table 4. Geographic Distribution of Home Mortgage Refinance Loans

Geographic Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2001			Geography: NAPLES MSA						Evaluation Period: JANUARY 1, 1999 TO						
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	% Owner Occ Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
NAPLES MSA	630	61.46	1.18	0.00	7.73	0.48	57.92	71.59	33.17	27.94	3.44	0.00	1.08	3.72	3.15
Limited Review:															
FORT MYERS MSA	333	32.49	0.53	0.00	13.44	1.50	74.89	89.79	11.14	8.71	0.09	0.00	0.00	0.11	0.00
TAMPA-ST.PETERSBURG MSA	62	6.05	0.89	0.00	21.65	4.84	47.78	33.87	29.69	61.29	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Southeast Region 1.

** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

*** Percentage of Owner Occupied Units is the number of owner occupied housing units in a particular geography divided by number of owner occupied housing units in the area based on 1990 Census information.

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Table 5. Geographic Distribution of Multifamily Loans

Geographic Distribution: MULTIFAMILY 2001		Geography: NAPLES MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,							
MA/Assessment Area:	Total Multifamily Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	% MF Units***	% BANK Loans	Over all	Low	Mod	Mid	Upp
Full Review:															
NAPLES MSA	2	9.09	1.80	0.00	2.10	0.00	41.08	100.00	55.03	0.00	9.09	0.00	0.00	22.22	0.00
Limited Review:															
TAMPA-ST.PETERSBURG MSA	14	63.64	3.48	0.00	15.51	50.00	50.67	42.86	30.20	7.14	0.00	0.00	0.00	0.00	0.00
FORT MYERS MSA	6	27.27	0.86	0.00	5.77	0.00	66.84	100.00	26.53	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Southeast Region 1.

** Multifamily loans originated and purchased in the MA/AA as a percentage of all multifamily loans originated and purchased in the rated area.

*** Percentage of multifamily units is the number of multifamily housing units in a particular geography divided by number of multifamily housing units in the area based on 1990 Census information.

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Table 6. Geographic Distribution of Small Loans to Businesses

Geographic Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2001			Geography: NAPLES MSA						Evaluation Period: JANUARY 1, 1999 TO						
MA/Assessment Area:	Total Small Business Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	% of Business***	% BANK Loans	Overall	Low	Mod	Mid	Upp
Full Review:															
NAPLES MSA	2,125	68.31	1.51	1.08	4.32	1.93	59.41	65.93	34.76	31.06	7.43	8.00	5.99	8.86	5.66
Limited Review:															
FORT MYERS MSA	704	22.63	0.71	0.14	10.63	6.25	74.61	78.84	14.04	14.77	1.20	0.00	1.03	1.26	1.24
TAMPA-ST.PETERSBURG MSA	282	9.06	1.32	0.71	23.95	18.44	43.37	46.81	31.18	34.04	0.00	0.00	0.01	0.00	0.00

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2001).

NATIONAL BANK OF FLORIDA

Table 7. Geographic Distribution of Small Loans to Farms

Geographic Distribution: SMALL LOANS TO FARMS 31, 2001		Geography: NAPLES MSA						Evaluation Period: JANUARY 1, 1999 TO DECEMBER							
MA/Assessment Area:	Total Small Farm Loans		Low-Income Geographies		Moderate-Income Geographies		Middle-Income Geographies		Upper-Income Geographies		Market Share (%) by Geography				
	#	% of Total**	% of Farms***	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	% of Farms**	% BANK Loans	Overa ll	Low	Mod	Mid	Upp
Full Review:															
NAPLES MSA	0	0.00	1.38	0.00	16.93	0.00	62.00	0.00	19.69	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:															
FORT MYERS MSA	0	0.00	0.14	0.00	12.52	0.00	75.65	0.00	11.70	0.00	0.00	0.00	0.00	0.00	0.00
TAMPA-ST.PETERSBURG MSA	0	0.00	0.56	0.00	25.14	0.00	48.97	0.00	25.33	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Source Data - Dun and Bradstreet (2001).

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Table 8. Borrower Distribution of Home Purchase Loans

Borrower Distribution: HOME PURCHASE 2001		Geography: NAPLES MSA					Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,					Market Share				
MA/Assessment Area:	Total Home Purchase Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers							
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	Over all	Low	Mod	Mid	Upp	
Full Review:																
NAPLES MSA	953	48.38	17.77	8.97	19.99	25.03	22.95	22.48	39.29	43.52	2.40	3.94	3.31	2.93	1.74	
Limited Review:																
FORT MYERS MSA	969	49.19	16.34	2.27	20.25	11.25	24.98	18.86	38.44	67.61	0.13	0.20	0.07	0.15	0.14	
TAMPA-ST.PETERSBURG MSA	48	2.44	18.05	2.44	19.51	21.95	23.38	14.63	39.06	60.98	0.00	0.00	0.00	0.00	0.00	

* Based on 2000 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 7.41% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** Home purchase loans originated and purchased in the MA/AA as a percentage of all home purchase loans originated and purchased in the rated area.

NATIONAL BANK OF FLORIDA

Table 9. Borrower Distribution of Home Improvement Loans

Borrower Distribution: HOME IMPROVEMENT 2001			Geography: NAPLES MSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31,					Market Share				
MA/Assessment Area:	Total Home Improvement Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Over all	Low	Mod	Mid	Upp	
	#	% of Total**	% Families**	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****	% Families*	% BANK Loans****						
Full Review:																
NAPLES MSA	150	73.53	17.77	16.90	19.99	26.76	22.95	27.46	39.29	28.87	11.40	11.94	13.21	12.69	8.86	
Limited Review:																
FORT MYERS MSA	29	14.22	16.34	11.54	20.25	26.92	24.98	34.62	38.44	26.92	0.09	1.25	0.00	0.00	0.00	
TAMPA-ST.PETERSBURG MSA	25	12.25	18.05	17.39	19.51	17.39	23.38	26.09	39.06	39.13	0.00	0.00	0.00	0.00	0.00	

* Based on 2000 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 6.37% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** Home improvement loans originated and purchased in the MA/AA as a percentage of all home improvement loans originated and purchased in the rated area.

NATIONAL BANK OF FLORIDA

Table 10. Borrower Distribution of Home Mortgage Refinance Loans

Borrower Distribution: HOME MORTGAGE REFINANCE DECEMBER 31, 2001		Geography: NAPLES MSA						Evaluation Period: JANUARY 1, 1999 TO							
MA/Assessment Area:	Total Home Mortgage Refinance Loans		Low-Income Borrowers		Moderate-Income Borrowers		Middle-Income Borrowers		Upper-Income Borrowers		Market Share				
	#	% of Total**	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	% Families**	% BANK Loans****	Over all	Low	Mod	Mid	Upp
Full Review:															
NAPLES MSA	630	61.46	17.77	9.48	19.99	22.71	22.95	26.80	39.29	41.01	3.99	3.18	4.46	4.06	3.89
Limited Review:															
FORT MYERS MSA	333	32.49	16.34	3.79	20.25	16.40	24.98	28.71	38.44	51.10	0.10	0.00	0.12	0.10	0.13
TAMPA-ST.PETERSBURG MSA	62	6.05	18.05	6.45	19.51	4.84	23.38	12.90	39.06	75.81	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Mortgage Data: Southeast Region 1.

** As a percentage of loans with borrower income information available. No information was available for 3.32% of loans originated and purchased by BANK.

*** Percentage of Families is based on the 1990 Census information.

**** Home mortgage refinance loans originated and purchased in the MA/AA as a percentage of all home mortgage refinance loans originated and purchased in the rated area.

NATIONAL BANK OF FLORIDA

Table11. Borrower Distribution of Small Loans to Businesses

Borrower Distribution: SMALL LOANS TO BUSINESSES DECEMBER 31, 2001		Geography: NAPLES MSA				Evaluation Period: JANUARY 1, 1999 TO			
MA/Assessment Area:	Total Small Loans to Businesses		Businesses With Revenues of \$1 million or less		Loans by Original Amount Regardless of Business Size			Market Share	
	#	% of Total**	% of Business***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
NAPLES MSA	2,125	68.31	85.83	83.53	85.79	8.05	6.16	7.43	19.12
Limited Review:									
FORT MYERS MSA	704	22.63	86.41	79.12	72.73	15.77	11.51	1.20	2.65
TAMPA-ST.PETERSBURG MSA	282	9.06	85.45	84.40	63.12	17.38	19.50	0.00	0.01

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to businesses originated and purchased in the MA/AA as a percentage of all small loans to businesses originated and purchased in the rated area.

*** Businesses with revenues of \$1 million or less as a percentage of all businesses (Source D&B - 2001).

**** Small loans to businesses with revenues of \$1 million or less as a percentage of all loans reported as small loans to businesses. No information was available for 0.26% of small loans to businesses originated and purchased by the bank.

NATIONAL BANK OF FLORIDA

Table12. Borrower Distribution of Small Loans to Farms

Borrower Distribution: SMALL LOANS TO FARMS 31, 2001		Geography: NAPLES MSA			Evaluation Period: JANUARY 1, 1999 TO DECEMBER				
MA/Assessment Area:	Total Small Loans to Farms		Farms With Revenues of \$1 million or less		Loans by Original Amount Regardless of Farm Size			Market Share	
	#	% of Total**	% of Farms***	% BANK Loans****	\$100,000 or less	>\$100,000 to \$250,000	>\$250,000 to \$1,000,000	All	Rev\$ 1 Million or Less
Full Review:									
NAPLES MSA	0	0.00	88.43	0.00	0.00	0.00	0.00	0.00	0.00
Limited Review:									
FORT MYERS MSA	0	0.00	86.67	0.00	0.00	0.00	0.00	0.00	0.00
TAMPA-ST.PETERSBURG MSA	0	0.00	87.60	0.00	0.00	0.00	0.00	0.00	0.00

* Based on 2000 Peer Small Business Data: US&PR.

** Small loans to farms originated and purchased in the MA/AA as a percentage of all small loans to farms originated and purchased in the rated area.

*** Farms with revenues of \$1 million or less as a percentage of all farms (Source D&B - 2001).

**** Small loans to farms with revenues of \$1 million or less as a percentage of all loans reported as small loans to farms. No information was available for 0.00% of small loans to farms originated and purchased by the bank.

NATIONAL BANK OF FLORIDA

Table 14. Qualified Investments

QUALIFIED INVESTMENTS		Geography: NAPLES MSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001			
MA/Assessment Area:	Prior Period Investments		Current Period Investments		Total Investments			Unfunded Commitments	
	#	\$(000's)	#	\$(000's)	#	\$(000's)	% of Total	#	\$(000's)
Full Review:									
NAPLES MSA	0	0	14	629	14	629	13.41	0	0
Limited Review:									
FORT MYERS MSA	0	0	25	2,648	25	2,648	56.45	0	0
TAMPA-ST.PETERSBURG MSA	0	0	19	1,414	19	1,414	30.14	0	0

* 'Prior Period Investments' means investments made in a previous evaluation period that are outstanding as of the examination date.

** 'Unfunded Commitments' means legally binding investment commitments that are tracked and recorded by the institution's financial reporting system.

NATIONAL BANK OF FLORIDA

Table 15. Distribution of Branch Delivery System and Branch Openings/Closings

DISTRIBUTION OF BRANCH DELIVERY SYSTEM AND BRANCH OPENINGS/CLOSINGS								Geography: NAPLES MSA				Evaluation Period: JANUARY 1, 1999 TO DECEMBER 31, 2001					
MA/Assessment Area:	Deposits	Branches						Branch Openings/Closings				Population					
	% of Rated Area Deposits in AA	# of BANK Branches	% of Rated Area Branches in AA	Location of Branches by Income of Geographies (%)				# of Branch Openings	# of Branch Closings	Net change in Location of Branches (+ or -)				% of Population within Each Geography			
				Low	Mod	Mid	Upp			Low	Mod	Mid	Upp	Low	Mod	Mid	Upp
Full Review:																	
NAPLES MSA	48.89	11	36.67	0	0	27.27	72.73	3	1	0	0	1	1	5.23	10.56	59.09	25.11
Limited Review:																	
FORT MYERS MSA	30.79	8	26.66	0	0	87.50	12.50	1	0	0	0	1	0	1.29	15.17	73.72	9.82
TAMPA-ST.PETERSBURG MSA	20.32	11	36.67	0	9.09	45.46	45.46	0	1	0	-1	0	0	2.18	22.74	46.64	28.29

